

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

This document relates to:
*The County of Summit, Ohio, et al. v. Purdue
Pharma L.P., et al.*
Case No. 18-op-45090

MDL No. 2804

Case No. 17-md-2804

Hon. Dan Aaron Polster

HENRY SCHEIN, INC.'S
AFFIRMATIVE DEPOSITION DESIGNATIONS

Pursuant to the Civil Jury Trial Order, ECF No. 1598, entered on May 1, 2019, (as amended on July 29, 2019), attached as **Exhibit A** is Henry Schein, Inc.'s ("Schein") Affirmative Deposition Designations ("Deposition Designations"), including any objections, counters or responsive designations to these designations. By submitting these Deposition Designations, Schein does not waive any objections to the use of testimony and/or exhibits or their subject matter. Schein's inclusion of any testimony and/or exhibit within these Deposition Designations should not be construed as an admission that such testimony and/or exhibit is admissible if offered by Plaintiffs or another defendant. Schein expressly reserves the right to object to Plaintiffs' or another defendant's attempts to introduce any testimony and/or exhibit included in these Deposition Designations. Schein further reserves the right to revise or withdraw these Deposition Designations. Schein additionally reserves the right to play any testimony that has been affirmatively designated by any party. Schein also reserves the right to designate any ongoing or later-discovered testimony.

Dated: October 10, 2019

Respectfully Submitted,

/s/ John P. McDonald

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ John P. McDonald

John P. McDonald